

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

JUDICIAL WATCH, INC.,
and TRUE THE VOTE,

Plaintiffs,

v.

J. BRADLEY KING, *et al.*

Defendants.

Case No. 1:12-cv-800-WTL-TAB

PLAINTIFFS' FIRST MOTION TO COMPEL PRODUCTION OF DOCUMENTS

Plaintiffs Judicial Watch, Inc. and True the Vote, by counsel and pursuant to Federal Rule of Civil Procedure 37 and Local Rule 37-1 of the U.S. District Court for the Southern District of Indiana, hereby file this First Motion to Compel Production of Documents. Plaintiffs have requested copies of all emails between the Indiana Election Division and county election officials concerning voter list maintenance, but Defendants have failed to produce all discoverable documents responsive to this request. For the reasons outlined in the accompanying Brief in support of this Motion, Plaintiffs respectfully request the Court grant this request and order Defendants to produce all responsive documents.

Dated: January 28, 2014

Respectfully submitted,

<p>J. Christian Adams Admitted <i>Pro Hac Vice</i></p> <p>ELECTION LAW CENTER, PLLC 300 N. Washington Street, Ste. 405 Alexandria, VA 22314 Tel: (703) 963-8611 Email: adams@electionlawcenter.com</p> <p>David R. Langdon Joshua B. Bolinger</p> <p>LANGDON LAW LLC 8913 Cincinnati-Dayton Rd. West Chester, Ohio 45069 Tel: (513) 577-7380 Email: dlangdon@langdonlaw.com jbolinger@langdonlaw.com</p>	<p><u>/s/ Chris Fedeli</u> Paul J. Orfanedes Chris Fedeli Admitted <i>Pro Hac Vice</i></p> <p>JUDICIAL WATCH, INC. 425 Third Street S.W., Ste. 800 Washington, DC 20024 Tel: (202) 646-5172 Email: porfanedes@judicialwatch.org cfedeli@judicialwatch.org</p>
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CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of January, 2014, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Chris Fedeli

Chris Fedeli